



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive
Framework and to Examine the Integration of
Greenhouse Gas Emissions Standards into
Procurement Policies.

R.06-04-009

**COMMENTS OF
SIERRA PACIFIC POWER COMPANY (U 903 E) ON PROPOSED DECISION OF
PHASE 1 ISSUES**

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I. INTRODUCTION

Sierra Pacific Power Company (Sierra) submits the following comments on the proposed *Interim Decision on Phase I Issues: Greenhouse Gas Emissions Performance Standard* issued on December 13, 2006 ("Proposed Decision" or "PD"). Sierra supports Section 5.3 ("Alternative Compliance Provisions for Multi-Jurisdictional Electrical Corporations") of the PD except for the interim procedure required of multi-jurisdictional utilities ("MJUs") pending approval of their applications for alternative compliance pursuant to Pub. Util. Code § 8341(d)(9). Despite clear statements by the California Public Utilities Commission ("CPUC" or "Commission") that MJUs would not need to demonstrate compliance with the greenhouse gas ("GHG") emission performance standard ("EPS") upon approval of alternative compliance, the CPUC is ordering MJUs to comply pending approval of their application for alternative compliance. Not only is the proposed scheme somewhat inconsistent (first Sierra must comply then it may not need to comply), it creates business risk for Sierra and rate uncertainty to the detriment of its California ratepayers. A less disruptive approach to Sierra and its ratepayers, which would be more

compatible with the intent of the statute, would be to toll compliance with the EPS until the Commission reaches a decision with respect to the MJU's request for approval of the alternative compliance proposal pursuant to the statute. Sierra sincerely believes that a delay pending adjudication of its proposal for alternative compliance would not measurably increase the financial and reliability risk to California ratepayers from future GHG regulatory regimes. In order to accelerate resolution of this issue, and minimize uncertainty to California ratepayers, Sierra proposes to submit its application for alternative compliance within 60 days of an order by the Commission deciding Phase 1 issues.

II. DISCUSSION

A. Background on Sierra's California Operations.

Sierra Pacific Power Company is a Nevada corporation providing electric utility services in three jurisdictions: Nevada, California, and FERC. Sierra operates a single electrical system with a combined count of over 400,000 customers in both states, but with approximately 45,000 customers in northeastern California. The vast majority of Sierra's service territory and retail customers are located in Nevada. Sierra's peak load is under 1,800 MWs overall and over half of its energy requirements are provided through purchased power. Virtually Sierra's entire load, including its California customers, is served by electrical resources located outside of the State of California. Sierra operates its own control area consistent with Western Energy Coordinating Council ("WECC") and National Energy Reliability Council ("NERC") protocols, and its operations are outside of the control area of the California Independent System Operator ("CAISO"). Sierra does not currently file resource procurement plans in California, nor is it required to demonstrate resource adequacy compliance at the Commission. However, under Nevada law, Sierra is required to file an integrated resource plan ("IRP") every three years, with

annual energy supply plans submitted for approval between cycles, and is currently in the process of developing a new resource plan submittal that is expected to be presented to the Public Utilities Commission of Nevada (“PUCN”) by July 1, 2007.

B. The Proposed Decision Should Provide A Means For MJUs To Pursue The Alternative Compliance Scheme for MJUs Provided Under Section 8341(d)(9) Before Imposing The EPS

As recognized in the Proposed Decision, Pub. Util. Code § 8341(d)(9) authorizes the CPUC to approve an alternative compliance scheme for MJUs by which MJUs would not need to demonstrate EPS compliance. While the statute does not require the Commission to exempt MJUs from such compliance, the fact that this provision is part of the statute demonstrates that the Legislature specifically contemplated and embraced the concept for multi-state utilities like Sierra. There are a number of readily apparent implementation problems that the Legislature may have foreseen and wished the CPUC to avoid through the application of the alternative compliance mechanism.

For example, the alternative compliance mechanism allows the CPUC to avoid the difficult question of whether to interpret the statute to apply to all sources of out-of-state generation that Sierra might use to meet its California load. Since electrical service of California and Nevada load is operated as an integrated whole, any limit on Sierra’s freedom to serve its California load may constrain its ability to meet its Nevada obligations in the most efficient manner. Thus, requiring Sierra to meet the California EPS could prohibit Sierra from entering into certain cost effective long-term obligations to serve its rapidly growing Nevada loads. Permitting alternative compliance as expressly contemplated by the Legislature would allow the CPUC to avoid the issue of whether and how to apply this law extraterritorially to limit its procurement of resources to serve its out-of-state customers.

Similarly, to the extent that the CPUC interprets the law to limit the number of suppliers who may provide power to Sierra's California retail market, it could increase wholesale electricity costs associated with serving Sierra's California ratepayers. Coincidentally, because Sierra's California and Nevada retail markets are integrated, this interpretation could increase wholesale energy costs for Nevada ratepayers as well. Relieving Sierra from the obligation of demonstrating EPS compliance as expressly contemplated by the statute would relieve the Commission from having to design a rate scheme to reimburse Sierra for the increased costs to serve Nevada ratepayers. Since the CPUC does not have jurisdiction over Nevada rates Sierra's only option would be to impose rate increases on Sierra's relatively small number of California ratepayers to address the effective segregation of Sierra's resources that would be likely necessary to satisfy California's EPS. Considering that Sierra has roughly ten times the number of Nevada ratepayers as California ratepayers, the Commission would have to impose significant rate increases on California ratepayers to balance the increased costs that Sierra would incur to address new operational limitations and maintain reliable service to its Nevada customers. To avoid these problems and potential cost and operation impacts, the PD should provide MJUs like Sierra a reasonable window of time to have their alternative compliance proposals decided before the California EPS is imposed.

Moreover, Sierra must submit an IRP to the PUCN for approval on a three-year cycle, which includes resources that will serve both Nevada and California customers. The CPUC has traditionally deferred to the PUCN's resource planning processes.¹ Stated differently, the PD injects certain new regulatory risks that will result in unnecessary and expensive delays for Sierra's total customer base by imposing the EPS until the Commission approves the alternative

¹ See for example, D.04-02-044, where the Commission relieved Sierra from the AB 57 procurement planning compliance burdens consistent with the exemption set forth in Cal. Pub. Util. Code § 454.5(i).

compliance approach contemplated under the statute. Requiring Sierra to meet the EPS could place it in the untenable position of disrupting its current, ongoing resource planning efforts required by Nevada law by potentially prohibiting it from procuring supplies from out-of-state resources that the PUCN requires Sierra to secure. Approving alternative compliance by exempting Sierra from the EPS pursuant to § 8341(d)(9) would avoid placing Sierra in the position of having to decide which state commission to obey.

These are just some of the difficult issues that the Legislature could have had in mind in passing AB 1368 with the special provision authorizing the CPUC to exempt Sierra from demonstrating EPS compliance. Sierra suggests that it is reasonable to conclude that the Legislature intended for the CPUC to avoid these thorny jurisdictional and rate design issues by utilizing the alternative compliance mechanism of § 8341(d)(9). Accordingly, the PD should be revised to provide a reasonable period of time for Sierra to make its alternative compliance showing and secure approval from the CPUC prior to the EPS being imposed.

C. Requiring Interim Compliance Pending an Application for Alternative Compliance Does Not Further the Statutory Scheme.

In light of the potential implementation issues mentioned above, Sierra is confused by the procedure enunciated by the Commission for making the requisite showing for alternative compliance. The PD states that the MJU should file its proposal for alternative compliance as an application with service on the service list in this proceeding. This procedure is straightforward, but the Commission's requirement for demonstrating interim compliance is confusing. The PD requires that "unless and until" the Commission approves the application MJUs "are required to submit annual Advice Letters demonstrating compliance with the EPS pursuant to the procedures discussed in Section 5.2 above." (PD at p. 138.) This requirement is confusing for several reasons. First, the PD proposes to accept PacifiCorp's three alternative compliance tests as the

substantive requirements for compliance with the new statute. However, as part of the *procedure* for “how multi-jurisdictional utilities will make a showing that they comply with one of the above three tests ...” the PD imposes the significant, *substantive* requirement of interim compliance with the EPS. (PD at 137.) Since compliance with the EPS is a complicated task for an MJU for the reasons indicated above, Sierra is surprised that the Commission would order substantive compliance with the EPS requirement as part of its explanation of procedures for showing alternative statutory compliance. Sierra believes that the PD insufficiently explains the Commission’s rationale for imposing the additional costs and burdens of interim compliance where the statute has explicitly contemplated interstate comity under its alternative compliance provision.

Second, Sierra is concerned that the Commission has not fully considered the ramifications of ordering interim compliance with the EPS pending resolution of an MJU’s application for alternative compliance. The discussion above touches on some of these impacts but there are undoubtedly others. For example, because of the geographic parameters of Sierra’s mountainous California service territory its California ratepayers benefit from service by a predominantly Nevada utility with access to low cost resources in Nevada and beyond. In other words, California customers can receive lower cost service by sharing in the pool of resources that Sierra uses to serve its entire retail load. Instituting an interim rule that essentially dictates the separation of Sierra’s California customers from the rest of its customer base by allocation or other dedication of the resources that Sierra can use to serve California load creates additional operational, reliability and cost issues. These actions, necessary to achieve interim EPS compliance for its California customers, could result in significant cost allocation issues between the CPUC and PUCN. If fully implemented on a permanent basis, allocation of resources could

also lead to decreased economies and increased costs for Sierra's California customers, and disrupt the resource planning efforts that have been already undertaken under the auspices of the PUCN resource planning processes. Additionally, it would seem to defeat the purpose of the paragraph (d)(9) by requiring an MJU to comply with the EPS while it awaits a decision by the Commission that compliance with the EPS is unnecessary.

Third, it is unclear what the PD in Section 5.3 means by "demonstrating compliance with the EPS pursuant to the procedures discussed in Section 5.2" as it applies to MJUs. Section 5.2 describes an annual, retrospective advice letter filing that attests to compliance with the EPS during the prior calendar year. Section 5.2 also incorporates documentation requirements described in Section 5.5 (not just procedural requirements as suggested in Section 5.3), and subjects the MJU to penalties for any incomplete, misleading or incorrect information required by Section 5.5. Therefore, in an attenuated fashion, the Commission appears to subject MJUs to the requirements of Section 5.5 (through Section 5.3 that references Section 5.2 that references Section 5.5) even though Section 5.5 does not mention MJUs. Sierra wonders whether this was the Commission's true intention because it would have been more direct and certainly clearer to add MJUs by name to the text of Section 5.5 LSEs.

In addition, Section 5.5 requires documentation of a number of activities pursuant to an advice letter filing, including:

- Listing of new or planned long-term financial commitments demonstrating that all procurement is EPS-compliant;
- Multiple contracts of less than five years with the same supplier, resource or facility;
- Disclosure of all investments in retained generation; and
- Requests for reliability exemptions or modifications based on extraordinary circumstances.

Again, requiring such documentation implicitly incorporates substantive requirements ostensibly applicable to other parties as part of a procedure for MJUs to demonstrate temporary compliance with the EPS. Sierra questions whether it is necessary to craft the compliance procedure of LSEs that do not have a special statutory exemption into a temporary procedure for MJUs that do. Sierra submits that one of the purposes of the statute was to relieve MJUs from making these kinds of showings.

Fourth, when the PD states that Sierra is to file annual advice letters “unless and until” its application is approved, the Commission suggests that a decision on Sierra’s application could take years. The prospect that the Commission could take years to determine whether Sierra meets one of PacifiCorp’s three alternative compliance tests creates substantial and unnecessary regulatory uncertainty for California ratepayers and business risks for Sierra. However, compliance with the statute as recommended by Sierra in these comments is a much simpler and less time consuming undertaking than suggested by this language in the PD that is consistent with the statute. Section 8341(d)(9) permits an MJU to propose alternative compliance upon showing that the utility serves 75,000 or less retail customers in California, and:

- (A) A majority of the electrical corporation’s retail end-use customers for electric service are located outside of California; and
- (B) The emissions of greenhouse gases to generate electricity for retail end-use customers of the electrical corporation are subject to a review by the utility regulatory commission of at least one other state in which the electrical corporation provides regulated retail electrical service.

Sierra has consistently made filings before the Commission that it has less than 75,000 end-use customers in California and that a majority of its customers are in Nevada. These elements of the statute are not controversial.

As for (B), the PD adopts PacifiCorp's three alternative compliance tests, including 1) when a state jurisdiction requires a utility to review and report on the potential impacts of different carbon policies within its IRP process, or 2) when it requires the utility to disclose its greenhouse gas emissions or expects change in overall emissions as a result of changes to its portfolio. As Sierra has previously stated in comments filed with the Commission on October 18, 2006, the Nevada Administrative Code ("NAC") imposes review and reporting obligations on Sierra that include semi-annual disclosure of average carbon dioxide emissions in pounds per megawatt-hour. There are additional requirements that the PUCN requires of Sierra by order. Sierra can readily demonstrate in its application that Nevada imposes these regulatory requirements and it should not take the CPUC very long at all to conclude that one of these tests is satisfied.

Sierra also points out in regard to paragraph (d)(9)(B) that the statute requires only that the qualified MJU show that its GHG emissions "are subject to review" by another state. Once the Commission is satisfied that a sister state reviews the MJU's GHG emissions by one of the three means that the CPUC has adopted then the MJU has satisfied the statutory inquiry. Such a showing should turn on what the PUCN regulates and that inquiry should largely be a matter of law, though Sierra is prepared to present explanatory information as part of its application. That the CPUC's focus should be on what Nevada regulates is entirely appropriate since, with a very minor exception, the GHG emissions at issue are not from California sources and are already subject to the jurisdiction of the PUCN. (NAC § 704.9361.) The statutory scheme contemplates that the CPUC should exercise its discretion to accept alternative compliance when the sister state has the authority and exercises that authority over GHG emissions. To decide otherwise, even on an interim basis, creates jurisdictional conflicts between California and the utility

regulatory commissions of sister states that the statutory scheme is expressly designed to avoid. Sierra submits that the Commission should modify the PD to make clear it will exercise its discretion consistently with the purpose of § 8341(d)(9) and defer any requirement that Sierra comply with the EPS until it decides on Sierra's filing for alternative compliance under § 8341(d)(9).

D. Sierra Requests that the PD Omit the Current Requirement for Interim Compliance with the EPS.

The Proposed Decision now reads as follows:

Finally, we must address how multi-jurisdictional utilities will make a showing that they comply with one of the above three tests and the other requirements of § 8341(d)(9). We conclude that the utility should file its proposal as an application with service on the service list in this proceeding, or its successor proceeding. Unless and until that application is approved by the Commission, all multi-jurisdictional utilities are required to submit annual Advice Letters demonstrating compliance with the EPS pursuant to the procedures discussed in Section 5.2 above. In addition to the information described in that section, the multi-jurisdictional utility's compliance filing shall describe the method used to identify and allocate its long-term financial commitments to California retail customer load.

(PD at p. 138, emphasis added) Sierra requests that the Commission not adopt the sentence highlighted above that calls for interim compliance with the EPS. In its stead Sierra requests that the Commission adopt language permitting MJUs an opportunity to file for alternative compliance within 60 days of the date of the final Phase 1 decision and specify that any obligation to comply with the EPS is tolled until the Commission acts on the MJU application. In this fashion the Commission will be assured that the issue of MJU alternative compliance will be addressed promptly and will not create a financial or reliability risk to Sierra's California ratepayers. Sierra has attached as Appendix A proposed redlined changes to the proposed findings of fact, conclusions of law and the ordering paragraphs to make such modifications.

III. CONCLUSION

Sierra supports the Proposed Decision's Alternative Compliance Provisions for Multi-Jurisdictional Electrical Corporations, with the sole exception of interim requirements to comply with the EPS pending approval of their applications for alternative compliance pursuant to Pub. Util. Code § 8341(d)(9). The Proposed Decision injects substantial and unnecessary uncertainties over what Sierra must file to demonstrate in the interim while approval of the alternative compliance mechanism provided by the statute is pending. Also, the requirement for interim compliance with the EPS pending a potentially long period for considering whether to grant an MJU proposal for alternative compliance creates business risk to the detriment of California ratepayer interests. A less disruptive and more harmonious statutory approach would be to toll compliance with the EPS until the Commission reaches a decision that the MJU should comply with the EPS. In order to accelerate resolution of this issue, and minimize uncertainty to California ratepayers, Sierra proposes to submit its application for alternative compliance within 60 days of an order by the Commission deciding Phase 1 issues.

January 2, 2007

Respectfully submitted,

By /s/

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APPENDIX A

Proposed Changes to Findings of Fact, Conclusions of Law and Ordering Paragraphs

Insert New Findings of Fact (“FOF”) after current FOF 156 as follows and renumber subsequent, existing FOFs accordingly:

157. Requiring multi-jurisdictional electrical corporations to comply with the EPS on an interim basis while they seek approval of alternative compliance with the EPS would create an unnecessary business risk and rate uncertainty to the detriment of affected California ratepayers.

158. A less disruptive approach that is more harmonious with the intent of the statute would be to toll compliance with the EPS until the Commission reaches a decision on whether to approve proposals by multi-jurisdictional electrical corporations for alternative compliance.

159. A delay in applying the EPS to multi-jurisdictional electrical corporations pending adjudication of proposals for alternative compliance will not increase financial and reliability risk to California ratepayers from possible future GHG regulatory regimes.

160. Multi-jurisdictional electrical corporations should be allowed 60 days from the date of this final decision in which to file proposals for alternative compliance.

Insert New Conclusion of Law (“COL”) after current COL 4 as follows and renumber subsequent, existing COLs accordingly:

5. Notwithstanding other references to LSE or multi-jurisdictional electrical corporations, multi-jurisdictional electrical corporations shall be allowed a 60-day window from the date of this order to file proposals for alternative compliance with SB 1368. Other requirements applicable to LSEs shall not apply pending resolution of those applications. If a multi-jurisdictional electrical corporation does not elect to exercise this right, then the provisions applicable to LSEs elsewhere in this opinion will apply.

Insert New COLs after current COL 45 as follows and renumber subsequent, existing COLs accordingly:

46. Section 8341(d)(9) evidences a statutory intent by the Legislature to embrace interstate comity and avoid unnecessary inter-jurisdictional conflict.

47. The Commission finds that Section 8341(d)(9) contemplates alternative compliance upon the requisite showing by a multi-jurisdictional electrical corporation and it is reasonable for

the Commission to toll compliance with other requirements of SB 1368 pending resolution of a proposal for alternative compliance.

Modify Ordering Paragraph 14 as follows:

14. ~~Unless and until the alternative compliance request is approved by the Commission, each multi-jurisdictional electrical corporation is required to demonstrate compliance with the Interim EPS Rules pursuant to the procedures set forth in Ordering Paragraphs 4-11, and include in its~~ If a multi-jurisdictional electrical corporation submits a proposal for alternative compliance within 60 days of this order, then compliance with other requirements of this order shall not be required unless and until the Commission disallows the proposal. The compliance filing of a multi-jurisdictional electrical corporation shall include a description of the method used to identify and allocate long-term financial commitments to California retail load.

Certificate of Service

I hereby certify that I have this day served a copy of “Comments of Sierra Pacific Power Company (U 903 E) on Proposed Decision of Phase 1 Issues” on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on January 2, 2007 at Sacramento, California

_____/s/____

Eric Janssen

R.06-04-009
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